

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH

Case No.: 9:22-CV-80660-RAR

UNITED STATES OF AMERICA;

Plaintiff,

v.

PAUL J. MANAFORT, JR,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE GOVERNMENT'S COMPLAINT**

Defendant, through this unopposed Motion, respectfully requests the Court extend his time to Respond to the Complaint by sixty days. As good cause for the requested extension, Defendant states as follows:

1. The Motion is unopposed. As forecasted in Defendant's previous unopposed motion, the Parties require an additional extension (hopefully final) to finalize settlement of this case. Defendant has submitted an offer that the DOJ trial attorney expects to recommend to his office, pending receipt of additional documentary support from the Defendant.

2. Defendant's response to the Complaint is presently due on October 11, 2022.

3. The Parties have been in settlement discussions that both sides reasonably hope will resolve this case. The extensions the Court has granted have facilitated this process. Defendant has submitted an offer that the DOJ trial attorney expects to recommend to his office, and it will require additional time for his office to evaluate and finalize that offer.

54. Forcing the Parties to litigate a motion to dismiss or other threshold motions in the meantime will distract from and be detrimental to settlement efforts.

WHEREFORE, Defendant respectfully requests that this Court extend his deadline to respond to the complaint by sixty days, until **December 11, 2022**.

LOCAL RULE 7.1(a)(3) CONFERRAL

The undersigned has conferred with counsel for the Government and the Government does not oppose the relief this motion requests.

Dated: October 11, 2022

Respectfully submitted,

**MARCUS NEIMAN RASHBAUM
& PINEIRO LLP**

/s/ Derick R. Vollrath
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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on October 11, 2022, I filed the foregoing document through the Court's CM/ECF system which has caused service to be made upon all counsel of record in this case.

/s/ Derick Vollrath